

8EHQ-0394-12948
Contains No CBI

Shell Oil Company



One Shell Plaza
P.O. Box 4320
Houston, Texas 77210



March 21, 1994

(A)



Document Processing Center (TS-790)
Office of Toxic Substances
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460
ATTN: 8(e) Coordinator

Dear Sir:

SUBJECT: 7-DAY TOXICITY OF C14 SECONDARY ALCOHOL SULFATE, SODIUM SALT, TO THE FATHEAD MINNOW

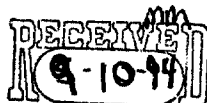
The following information is submitted under TSCA 8(e).

The No Effect Level (NOEL) for the 7-day aquatic toxicity of C14 Secondary Alcohol Sulfate, Sodium Salt, (CAS Number 6482-41-3) to the fathead minnow was found to be 4 mg/L, based on preliminary results.

Attached is a copy of the preliminary data transmission from the contracting laboratory, Wildlife International Ltd. The complete report will be sent to the Agency when available.

This report is filed to provide information EPA may find useful. In no way is it intended as a waiver of any rights or privileges belonging to Shell Oil Company as the reporting corporation, its agents or employees. The reporting corporation, its agents and employees, reserve the right to object to this report's use or admissibility in any subsequent judicial or administrative proceeding against the corporation, its agents or employees.

This report has been compiled based on information available as of the date of filing. The corporation, its agents and employees reserve the right to supplement the data contained in this report, and to revise and amend any conclusions drawn therefrom.



CU940801.THG

2
This report contains no confidential business information.

The following person should be contacted if you have questions or a need for discussion.

J. C. Willett
Manager, Product Safety and Compliance
Shell Oil Company
P. O. Box 4320
Houston, TX 77210
Telephone No. 713-241-6958
Fax. 713-241-3325

Very truly yours,



R. N. Shulman, General Manager
Health, Safety, and Environment
Shell Oil Company

Attachment

THG/sjh

SUSPECT HAZARD REPORT SHR-291-94-08

**7-DAY TOXICITY OF DAN 214 TO THE
FATHEAD MINNOW**

03-03-94 14:00
03-03-94 14:00

CONTENTS

1. MEMORANDUM, HEG CHAIRMAN TO GENERAL MANAGER, HEALTH, SAFETY, AND ENVIRONMENT, MARCH 7, 1994. THE HEG REPORT.
2. SUSPECT HAZARD REPORT 291-94-08
3. INFORMATION RELATED TO THE REPORTS
 - a. A SUMMARY OF THE PERTINENT INFORMATION
4. INFORMATION RELATED TO THE PRODUCT
 - a. PSIS FOR DAN 214

SH9406804.291



Shell Oil Company
Interoffice Memorandum

MARCH 7, 1994

FROM: CHAIRMAN, HAZARD EVALUATION GROUP
TO: GENERAL MANAGER, HEALTH, SAFETY, AND ENVIRONMENT
SUBJECT: SHR 291-94-08

DATE SHR RECEIVED: MARCH 1, 1994

DATE 15 DAY PERIOD EXPIRES: MARCH 22, 1994

I. SUMMARY OF INCIDENT OR INFORMATION

The Original Reporting Person, D. C. L. Wong, submitted attached SHR 291-94-08 which reports the NOEL of DAN 214 in a 7-day toxicity study in the fathead minnow to be 4 mg/L based on preliminary results.

II. CONSIDERATION AND ANALYSIS OF THE INFORMATION

A. HEGIM MEETING

MARCH 3, 1994

J. C. Willett, Chair
G. A. Van Gelder, Vice Chair
T. H. Gardiner, Secretary

C. DISCUSSION

1. The Basic Data and Information.

a. Salient Points

i. Based on preliminary data, the NOEL of DAN 214 in a 7-day toxicity study in the fathead minnow was found to be 4 mg/L.

b. Coverage: DAN 214 is a research and development product of Shell Chemical Company.

c. Regulatory

- i. A Shell practice for automatic 8(e) reporting of environmental toxicity of 1 ppm was established during the CAP review program, paralleling EPA's guidance on mammalian toxicity. Values between 1 ppm and 100 ppm were individually examined to determine if the data "reasonably supported a conclusion of substantial risk." For consistency, the same criteria for environmental toxicity should be used for continuing TSCA 8(e) considerations.

III. PRIOR KNOWLEDGE OF INFORMATION

A. SHELL

Shell had no prior knowledge of the chronic environmental toxicity of DAN 214 to this organism. [A previous SHR (282-93-55) was submitted on the acute toxicity of DAN 214, and a subsequent TSCA 8(e) was filed, which reported the 96-hr LC₅₀ of DAN 214 to be between 3 and 10 mg/L in the fathead minnow.]

B. EPA ADMINISTRATOR

Probably the same lack of information as Shell.

C. THE GENERAL PUBLIC

Same lack of information as Shell and EPA.

V. CLASSIFICATION

- A. -X- RNS judgement required
- B. -X- Reportable on basis of Company criteria
- C. -- Unsubstantial on basis of Company criteria
- D. -- Not reportable-not applicable to the laws HEG is to consider.

- E. -- Reported elsewhere.
- F. -- Already known to the EPA Administrator.
- G. -- Not reportable by Shell because there is no Shell involvement with the material.


J. C. Willett

GTY/sjh

Conclusions:

The reported effects described above for DAN 214 are not necessarily substantial environmental effects as indicated by our own criteria. However, we should file a TSCA 8(e) report on the chronic toxicity, since we already submitted an 8(e) report on the acute toxicity of this material in this organism (SHR 282-93-55), and the degree of toxicity was relatively similar.

A handwritten signature in dark ink, appearing to read "R. N. Shulman", with a horizontal line drawn underneath the signature.

R. N. Shulman

Received 3/1/94

SUSPECT HAZARD REPORT

SHR-291-94-08

D-DATE: 3/22/94

Every individual employee must complete and submit a "Suspect Hazard Report" as soon as the condition is perceived. Employees may, if they so desire, report the condition directly to the governmental agency involved. Shell recognizes the right of each employee to make such notifications without fear of consequent detrimental action upon his or her employment relationship with the Company.

SEE REVERSE SIDE FOR NOTICE OF CIVIL AND CRIMINAL PENALTIES

LOCATION/SITE OF SUSPECT HAZARD

Westhollow Research Center

DATE OF NOTIFICATION

2-28-94

TYPE OF HAZARD

☐

HUMAN EFFECT

☒

ENVIRONMENTAL EFFECT

PRODUCT INVOLVED

*DAN 214***DESCRIPTION OF SUSPECT HAZARD**

Preliminary results of 7-day fathead minnow larval survival + growth test with DAN 214 show a NOEC of 4.0 mg/L based on nominal concentrations.

WRC SHR 02**INDIVIDUAL REPORTING SUSPECT HAZARD**

NAME

Diana C.L. Wong

EMPLOYEE NUMBER

725641

HOME PHONE NUMBER

(713) 550-2150

HOME ADDRESS

7402 Manor Bridge Ct., Houston, Texas 77095

SIGNATURE

*Diana C. Wong***INDIVIDUAL RECEIVING SUSPECT HAZARD REPORT (ON-SITE-COMMUNICATOR)**

NAME

Mike Mitchell

COMPANY PHONE NUMBER

594-7745

COMPANY LOCATION

Westhollow

SIGNATURE

*Mike Mitchell*DATE SENT TO HAZARD
EVALUATION GROUP*2-28-94***DISTRIBUTION INSTRUCTIONS**

- Originator completes Section 1, signs the form, and sends or brings the entire set, to the On-Site-Communicator.
- The On-Site-Communicator completes Section 2, signs the form and distributes the copies as follows:
 - Part 5 of this form is an envelope, pre-addressed to the Hazard Evaluation Group
 - Part 1 (white copy) is folded, inserted into the envelope and mailed immediately.
 - The remaining parts of the form are distributed as indicated at the bottom of each sheet.

HAZARD EVALUATION GROUP

8

NOTICE OF CIVIL AND CRIMINAL PENALTIES

This reporting form can be used to immediately report suspect hazards resulting from chemical substances and products covered by the following laws:

- Toxic Substances Control Act
- Consumer Product Safety Act

The maximum potential individual employee civil and criminal penalties for non-compliance under the above regulations are as follows:

REGULATION	CIVIL PENALTY	CRIMINAL PENALTY
TOXIC SUBSTANCE CONTROL ACT	An amount not to exceed \$25,000 for each violation. Each violation continues for each day as a separate matter.	Knowing and willful violation of the Act could result in a fine of up to \$25,000 and imprisonment for not more than one-year.
CONSUMER PRODUCT SAFETY ACT	An amount not to exceed \$5,000.	Knowingly and willfully violating the duty to report could result in a fine up to \$50,000 and imprisonment for not more than one-year.

DRAFT**HAS NOT RECEIVED
QA AUDIT****Preliminary Results of Fathead Minnow Larval Survival and Growth Test
With DAN 214**

Nominal Concentration (mg DAN 214/L)	Percent Survival	Mean Dry Weight/Fish (mg)
Negative Control	100	0.64
0.50	100	0.63
1.0	100	0.60
2.0	100	0.68
4.0	100	0.59
8.0	0	-

NOEC = 4.0 mg/L

LOEC = 8.0 mg/L

MATC = 5.7 mg/L

IC25 = 4.8 mg/L

IC50 = 5.8 mg/L



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

R.N. Shulman
General Manager
Health, Safety, and Environment
Shell Oil Company
One Shell Plaza
P.O. Box 4320
Houston, Texas 77210

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOV 04 1994

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

Terry R. O'Bryan
Terry R. O'Bryan
Risk Analysis Branch

Enclosure

12948 A



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contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: JAN 30 1995

NON-CAP

CAP

Submission number: 12948 A

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.):

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

For Contractor Use Only

entire document:

0

1

2

pages

1,2

pages

1

Notes:

* 2-SIDED

Contractor reviewer:

VP

Date:

10-4-94

CHEMICALS TRACKING DBASE ENTRY FORM

CECATS DATA: Submission # 8HQ 0394-12948 SEQ. A

TYPE INT. SUPP FLWP

SUBMITTER NAME: Shell Oil Company

INFORMATION REQUESTED: FLY P DATE: _____
 0501 NO INFO REQUESTED
 0502 INFO REQUESTED (TECH)
 0503 INFO REQUESTED (VOL ACTIONS)
 0504 INFO REQUESTED (REPORTING RATIONALE)
 DISPOSITION:
☒ REFER TO CHEMICAL SCREENING
 0678 CAP NOTICE

VOLUNTARY ACTIONS
☒ NO ACTION REPORTED
 0402 STUDIES PLANNED (HUMAN)
 0403 NOTIFICATION OF WORKER HEALTH
 0404 LABELING CHANGES
 0405 PROCESSING CHANGES
 0406 APP. USE DISCONTINUED
 0407 PRODUCTION DISCONTINUED
 0408 CONFIDENTIAL

SUB. DATE: 03/21/94 OTS DATE: 03/29/94 CSRAD DATE: 03/10/94

CHEMICAL NAME:

CAS# 6482-41-3

DAN 214
Sodium Salt, C14 Secondary Alcohol
Sulfate

INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C
0201 ONCO (HUMAN)	01 02 04	0216 EPUCLIN	01 02 04	0241 IMMUNO (ANIMAL)	01 02 04
0202 ONCO (ANIMAL)	01 02 04	0217 HUMAN EXPOS (PROD CONTAM)	01 02 04	0242 IMMUNO (HUMAN)	01 02 04
0203 CELL. TRANS (IN VITRO)	01 02 04	0218 HUMAN EXPOS (ACCIDENTAL)	01 02 04	0243 CHEMOPHYS PROP	01 02 04
0204 MUTA (IN VITRO)	01 02 04	0219 HUMAN EXPOS (MONITORING)	01 02 04	0244 CLASTO (IN VITRO)	01 02 04
0205 MUTA (IN VIVO)	01 02 04	0220 ECOAQUA TOX	01 02 04	0245 CLASTO (ANIMAL)	01 02 04
0206 REPRO/TERATO (HUMAN)	01 02 04	0221 ENV. OCCURENCE/FATE	01 02 04	0246 CLASTO (HUMAN)	01 02 04
0207 REPRO/TERATO (ANIMAL)	01 02 04	0222 EMER INCI OF ENV CONTAM	01 02 04	0247 DNA DAM/REPAIR	01 02 04
0208 NEURO (HUMAN)	01 02 04	0223 RESPONSE REQUEST DELAY	01 02 04	0248 PRODUCE/PROC	01 02 04
0209 NEURO (ANIMAL)	01 02 04	0224 PRODUCE/PROC ID	01 02 04	0251 MSDS	01 02 04
0210 ACUTE TOX. (HUMAN)	01 02 04	0225 REPORTING RATIONALE	01 02 04	0299 OTHER	01 02 04
0211 CHIR. TOX. (HUMAN)	01 02 04	CONFIDENTIAL	01 02 04		
0212 ACUTE TOX. (ANIMAL)	01 02 04	ALLERG (HUMAN)	01 02 04		
0213 SUB ACUTE TOX. (ANIMAL)	01 02 04	ALLERG (ANIMAL)	01 02 04		
0214 SUB CHRONIC TOX. (ANIMAL)	01 02 04	METAB/PHARMACO (ANIMAL)	01 02 04		
0215 CHRONIC TOX. (ANIMAL)	01 02 04	METAB/PHARMACO (HUMAN)	01 02 04		

PRODUCTION:

USE:

R-D

TOXICOLOGICAL CONCERN:

SPECIES

Fish

ONGOING REVIEW

YES (DROP/REFER)

NO (CONTINUE)

NO

LOW

MED

HIGH

Non-Cap